REMARKS

The Office Action mailed April 8, 2003 has been received and its contents carefully considered. Claims 1-22 remain pending in the present application. For the reasons set forth in detail below, all claims are believed to be in allowance.

As an initial matter, the Examiner objected to Figure 1, because it was not designated as "Prior Art" pursuant to MPEP § 608.02(g). Applicants appreciated this indication by the Examiner have designated Figure 1 as "Prior Art" accordingly.

The present Office Action rejects claims 1-22 under 35 U.S.C. § 103(a) as being unpatentable over the Applicant's admission of prior art (AAPA) and the Agranat et al. reference (U.S. Patent No. 5,973,696). Specifically, the Examiner rejects claims 1 and 17, alleging that AAPA teaches a protective relay for providing protective control to a power system comprising: a microprocessor; first and second connections to a communication network and the power system, respectively; and a communication server configured to receive relay configuration commands from a remote computer over the communications network, and to provide power system data and relay status data to the remote computer over the communications network. (See 4/8/03 Office Action, pp. 2-3).

The Examiner further asserts that AAPA teaches that the communication server communicates with remote computer over a communications network using a product-specific software, therefore, the communications capability of the protective relay is limited. The Examiner continues, One of ordinary skill in the art would recognize that the flexibility of AAPA's device would increase if the device can support standard web browser software. *Id.* at p. 3.

The Examiner explicitly indicates that the AAPA is deficient in teaching the communication server communicating with a remote computer over a communication network in a network format. To remedy this deficiency, the Examiner cites to the Agranat et al. reference. The Examiner alleges that the Agranat et al. reference teaches a device with embedded web server for communicating with remote computer over a communication network in a network format such as Hypertext Transfer Protocol (HTTP). The Examiner concludes that it would have been obvious to one of ordinary skill in the art at the time the invention was made to combine the teachings of AAPA and the Agranat et al. reference because it would increase the flexibility of AAPA's device by allowing the device easily communicates with any remote computer over a communications network in a standard network format. *Id.*

In addition, the Examiner rejects claims 2-16, and 18-22 under the same rationale as claims 1 and 17. *Id.* at pp 3-4.

For at least the reasons set forth below, Applicants respectfully submit that the cited combination of AAPA and the Agranat et al. reference fails to properly disclose or suggest each and every feature of the present invention. Initially, regarding Applicants' admitted prior art (AAPA), it should be understood that the conventional systems described in pages 1 and 2 of the present application relate to protective relay systems having a microprocessor and capable of inter-system communication over an archaic data link communication layer known as UART (See U.S. Patent No. 5,982,585). Additionally, Applicants disclosed that known human machine interfaces used for configuring and controlling such protective relays typically were implemented through product-specific software, thereby rendering consistent communications with the relays more difficult that desirable.

To over come these limitations, the present invention provides a protective relay wherein: a database stores data including protective relay control settings and power system data; a file system server is operatively connected to the database, the file system server capable of generating HTML files from the data stored in the database; and a communication protocol server operatively connected to the file system server and to a communication network, the communication protocol server capable of transmitting and receiving HTML files according to a hypertext transfer protocol over the communications network (See Cl. 17). By providing a file system server capable of generating HTML files from database data and a communication protocol server capable of transmitting such HTML files over a communication network, the ability to control and monitor the protective relay is greatly enhanced. Clearly, nothing within AAPA suggests or teaches this combination of elements.

To remedy this deficiency in AAPA, the Examiner cites the Agranat et al. reference for disclosing a device with an embedded web server for communicating with a remote computer over a communication network in a network format such as Hypertext Transfer Protocol (HTTP) as shown at Col. 11, lines 1-8 of the Agranat et al. reference. The Examiner concludes from this disclosure that it would have been obvious to combine the teachings of AAPA and the Agranat et al. reference because it would increase the flexibility of AAPA's device by allowing the device easily communicates with any remote computer over a communications network in a standard network format.

The Agranat et al. reference is directed toward a system which enables users to develop GUIs (graphical user interface) without consideration for the underlying software application for which the GUI is being developed. The GUI is developed by using a standard HTML editor, and is then compiled into the application for which it is being used at a later step (see Agranat et al.,

Cols. 11 and 12). Conversely, the present invention is not concerned which the actual

development of the GUI, rather the ability of a protective relay device to transmit HTML files

based upon stored relay data from a database over the communications network. For at least this

reason, Applicants' submit that the cited combination of references fails to disclose each and

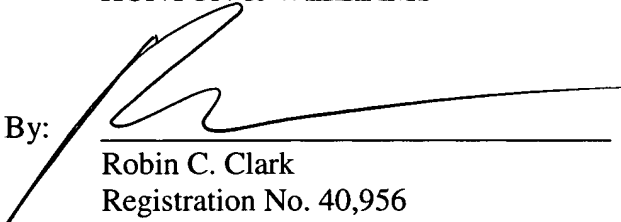every element of the present invention.

For at least the preceding reasons, all claims 1-22 are believed to be in condition for

allowance. Reconsideration and allowance of all claims is respectfully requested. Should the

Examiner deem that any further action by Applicants would be desirable in placing this

application in even better condition for issue, he is requested to contact the undersigned.

Respectfully submitted,

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